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HONORABLE MARY JO HESTON
HEARING DATE: April 9, 2020
TIME: 1:00 pm
RESPONSE DATE: April 2, 2020
Chapter 13
Tacoma, WA

4 **IN THE UNITED STATES BANKRUPTCY COURT FOR THE**
5 **WESTERN DISTRICT COURT OF WASHINGTON**

6 **Re**

7 **SUZIE JANE EDWARDS**
8 **Aka SUZIE JANE HONG**

9 **Debtor(s)**

In Chapter 13 Proceeding

No. 15-41510-MJH

RESPONSE TO SPECIALIZED LOAN
SERVICING LLC's MOTION FOR RELIEF
FROM STAY

10
11 COMES NOW the above-referenced debtor(s) through their attorneys of record and
12 states:

13 Specialized Loan Servicing LLC brought this Motion for Relief from Stay on the month
14 that Plan was set to discharge and there is no reasonable reason to do so other than to
15 incur additional fees and debts for the Debtor. The Debtor will be current with her
16 payments as of the date of the hearing and requests that the Motion be Denied,
17 however she does not want to extend her Plan past the 60 month period or incur
18 additional fees and costs waiting for the payments to be processed. It is requested that
19 the Motion be denied in its entirety. If it cannot be denied in its entirety then the Debtor
20 will agree to the Relief from Stay in order to complete her Plan.

21 Dated March 19, 2020.

22
23 /s/ Ellen Ann Brown

24 **ELLEN ANN BROWN WSB#27992**
25 **Attorneys for Debtor(s)**